

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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| In Re:<br><br>Richard Thomas Kontir<br><br>Debtor | Chapter 13<br><br>Bankruptcy No. 23-11010-PMM |
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**TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307**

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 04/06/2023.
3. This Motion to Dismiss has been filed for the following reason(s):
  - There has been unreasonable delay as defined by 11 U.S.C Section 1307(c)(1) by the above-captioned Debtor(s).

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 06/05/2024

Respectfully submitted,

/s/ Rolando Ramos, Esq.

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Rolando Ramos, Esq.  
for  
Scott F. Waterman, Esq.  
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